

United States Bankruptcy Court
Eastern District of Pennsylvania

In re Tamara Paradissis

Debtor(s)

Case No.
Chapter

17-16197
7

Motion to Avoid Judicial Lien on Personal Property

1. Debtor, Tamara Paradissis, commenced this case on September 12, 2017 by filing a voluntary petition for relief under Chapter 7 Title 11 of the United States Bankruptcy Code.
2. This court has jurisdiction over this motion, filed pursuant to 11 U.S.C. Sec. 522(f) to avoid and cancel a judicial lien held by Portfolio Recovery Associates, LLC on property held by the debtor.
3. On November 2, 2016 and December 12, 2016, creditors recorded a judicial lien against the following debtor's property:

All property of Debtor

The said judicial lien is entered of record as follows:

Bucks County Court of Common Pleas, 2016-01861, in the amount of \$2,733.22 and 2016-05947 in the amount of \$4,663.76

4. All such possessions of debtor(s) have been claimed as fully exempt in their bankruptcy case.
5. The existence of Portfolio Recovery Associates, LLC lien on debtor's household and personal goods impairs exemptions to which the debtor(s) would be entitled under 11 U.S.C. Sec. 522(b).

WHEREFORE, debtor(s) pray for an order against Portfolio Recovery Associates, LLC avoiding and canceling the judicial lien in the above-mentioned property, and for such additional or alternative relief as may be just and proper.

Date January 5, 2018

Signature /s/ Tamara Paradissis

Tamara Paradissis
Debtor